

THE WEITZ LAW FIRM, P.A.

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August 11, 2021

VIA CM/ECF

Honorable Judge Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square, Courtroom 1105
New York, NY 10007-1312

**Re: Velasquez v. 60th Street, LLC, d/b/a The Jeffrey Craft Beer & Bites, et al.
Case 1:21-cv-02948-VEC**

Dear Judge Caproni:

The undersigned represents the Plaintiff in the above-captioned case matter. Pursuant to Order D.E. 11, dated July 16, 2021, Plaintiff must move for default judgment by August 13, 2021. Counsel for Plaintiff states the following:

The original service of the Complaint was done by the Department of State, Division of Corporations, who serve corporate defendants via Certified Mail. The corporation addresses should be updated every two years by the corporations, but are not necessarily updated, and many old addresses remain registered with the Department of State. Doing some background research on this matter, it was found that the registered agent for defendant 60th Street, LLC has moved and does not currently have the same address as was registered with the Division of Corporations, who was the process server in this matter. Since they serve by certified mail, it is very possible, service was ineffectual. Therefore, a courtesy copy of the Complaint, along with the Summons, was resent to the defendant's registered agent to the new address.

Similarly, a copy of correspondence, along with a courtesy copy of the Summons and Complaint was forwarded to the property tax address and property management company of the Defendant 311313 LLC in an attempt to contact defendant at any viable address, in the event the registered agent for Defendant may have changed or moved, as generally is the case with registered agents.

For the above-stated reasons, the undersigned, respectfully requests an extension of time of 30 days, to move for default judgment and thereby allow time for the defendants to contact the undersigned, and/or make their appearance and answer the Complaint in this matter.

This Court may wish to take notice that this is the first request for extension of time with regard to the motion for default. Thank you for your attention to this request.

Sincerely,

By: /S/ B. Bradley Weitz

B. Bradley Weitz, Esq. (BW9365)

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